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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO.

EA-2021-0087

DIRECT TESTIMONY

OF

JAMES JONTRY, P.E., P.M.P.

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

**St. Louis, Missouri
April 28, 2021**

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address, and present position.**

3 A. My name is James (“Jim”) Jontry. My business address is One Ameren Plaza, 1901
4 Chouteau Avenue, St. Louis, Missouri 63103. I work for Ameren Services Company (“Ameren
5 Services”) as a Senior Project Manager in the Transmission Department. Ameren Services is a
6 subsidiary of Ameren Corporation (“Ameren”) and an affiliate of Ameren Transmission Company
7 of Illinois (“ATXI”), the Applicant in this proceeding.

8 **Q. What are the duties and responsibilities of your position?**

9 A. As a Senior Project Manager, I am responsible for the planning, execution,
10 completion, and operational integration of large-scale transmission construction projects. I am the
11 project manager for the Limestone Ridge Project (the “Project”) being proposed by ATXI.

12 **Q. Please describe your educational background and employment experience.**

13 A. I graduated from the University of Illinois in 1996 with a Bachelor of Science in
14 General Engineering. I graduated from Webster University in 2009 with a Master of Business
15 Administration. I am a registered Professional Engineer (“PE”) in the state of Missouri. I am also
16 a certified Project Management Professional (“PMP”). In 2003, I started working for Ameren
17 Services as an engineer in the Transmission and Distribution Design Department, where I designed
18 and managed projects of varying degrees of cost and complexity. In 2013, I transitioned to my
19 role as a project manager in the Transmission Department where I have worked since.

20 **Q. You indicated that you are a registered Project Management Professional, or**
21 **PMP. What is that credential and how is it attained?**

22 A. The Project Management Professional credential is issued by the Project
23 Management Institute, Inc. (“PMI”) and is an industry-recognized and globally-recognized

1 certification for project managers. A PMP demonstrates an individual has the experience,
2 education, and competency necessary to lead and direct projects and project teams. According to
3 the PMP Handbook published by the PMI (available at www.pmi.org), the PMP credential:

4 is accredited by the American National Standards Institute (“ANSI”) against the
5 International Organization for Standardization (“ISO”) 17024. The ISO 17024
6 standard includes vigorous requirements for examination development and
7 maintenance and for the quality management systems for continuing quality
8 assurance. In addition, PMP credential is also registered against the ISO 9001:2000
9 standard for quality management systems.

10 To apply for the PMP, an individual must have either: (i) a four-year degree and at least
11 three years of project management experience, with 4,500 hours leading and directing projects and
12 35 hours of project management education, or (ii) a secondary diploma with at least five years of
13 project management experience, with 7,500 hours leading and directing projects and 35 hours of
14 project management education. An applicant also must pass a four-hour examination requiring
15 application of project management concepts and experience to potential on-the-job situations. In
16 addition, as part of PMI’s Continuing Certification Requirements, to remain credentialed, a PMP
17 also must earn sixty professional development units per three-year certification renewal cycle.

18 **Q. Have you previously provided testimony before the Missouri Public Service**
19 **Commission (“Commission”)?**

20 A. Yes. I previously provided testimony in File Nos. EA-2015-0146 and EA-2017-
21 0345 in support of ATXI’s requests for a Certificate of Convenience and Necessity (“CCN”)
22 related to the Mark Twain Transmission Project.

23 **II. PURPOSE OF TESTIMONY**

24 **Q. Are you familiar with the Project for which ATXI is seeking a CCN in this**
25 **proceeding?**

1 A. Yes, ATXI requests a CCN authorizing it to construct, operate and maintain an
2 approximately 15-mile, 138 kilovolt transmission line (“Transmission Line”) and a substation in
3 Cape Girardeau County (“Whipple Substation”) to improve energy reliability in Perry and Cape
4 Girardeau Counties in Missouri and the surrounding region (the Transmission Line and the
5 Whipple Substation together are referred to as the “Project”). As described in the direct testimony
6 of ATXI Witness Sean Black, the Project is a part of a larger development in cooperation with
7 Citizens Electric Cooperative (“Citizens”) and Wabash Valley Power Alliance (“Wabash Valley”),
8 referred to herein as the “ATXI-Wabash Development.”

9 The Transmission Line will connect two new substations: the new Whipple Substation, to
10 be owned by ATXI, and the new Wittenberg Substation, to be owned by Wabash Valley. The
11 Whipple Substation will be adjacent to an expanded Wabash Valley Trail of Tears Substation
12 (“New TOT Substation”). While outside of the scope of the Project and the Petition, Wabash
13 Valley will also construct one additional line, approximately 1-2 miles in length, that will connect
14 the New TOT Substation to Wabash Valley’s Charmin Bulk Substation. Also in conjunction with
15 the Project, Ameren Missouri intends to sell to Wabash Valley a segment of line, approximately
16 1.5 miles in length, that it will no longer need or use following the energization of the ATXI-
17 Wabash Development. As indicated by Mr. Black, Ameren Missouri intends to pursue
18 independently the regulatory approvals necessary to consummate that transaction and has filed a
19 notice of intended case with the Commission, which was been designated as Case No. EM-2021-
20 0208.

21 **Q. What is the purpose of your direct testimony in this proceeding?**

22 A. The purpose of my testimony is to provide an overview of the Project schedule and
23 detail about the estimated cost and financing of the Project.

1 **Q. Are you sponsoring any schedules with your testimony?**

2 A. Yes, I am sponsoring the following:

- 3 • Schedule JJ-01 – High-level Project Schedule
- 4 • Schedule JJ-02 – Summary of Estimated Project Costs

5 **III. MANAGEMENT AND CONSTRUCTION**

6 **Q. How does ATXI intend to construct the Project?**

7 A. The Project will be constructed using the Design-Bid-Build process. In the Design-
8 Bid-Build process, Ameren Services directs each phase of the work activities. In this traditional
9 approach to project delivery, the owner (here, ATXI) arranges for the completion of the design.
10 In the bid phase, the owner then coordinates the bidding of the materials and any labor necessary
11 for the Project based on the design. The owner then selects the preferred vendors and orders
12 materials. Finally, the build phase requires the owner to coordinate the receipt of the materials
13 and manage construction, including the activities of any construction contractors.

14 **Q. Why does ATXI intend to use contractors to construct the Project?**

15 A. Using contractors is the most efficient and cost-effective means to construct
16 projects such as this one. It would be cost-prohibitive and inefficient to permanently employ the
17 internal staff necessary to support the peak manpower requirements associated with all
18 transmission line projects. Therefore, as it has routinely done in the past, Ameren Services, on
19 behalf of ATXI, will utilize contractors to construct the Project. It is ATXI's intention to use all
20 union contractors.

21 **Q. How will ATXI select contractors for the Project?**

22 A. Ameren Services, on behalf of ATXI, will use a formal sourcing process to secure
23 bids for the labor necessary to construct the Project. Generally, the sourcing process is comprised

1 of: (i) formation of a contract development team to identify and write the scope of work to be
2 completed, identification of qualified contractors for bidding, and the contractor selection criteria
3 necessary; (ii) evaluation and acceptance of the statements of qualifications and bids received from
4 those interested in the work as scoped; and (iii) negotiation of the terms and conditions most
5 favorable to ATXI. This rigorous sourcing process assures Ameren Services secures the best bid
6 for efficient and effective construction.

7 **Q. Please explain how ATXI will ensure adequate and efficient construction of**
8 **the Project.**

9 A. Ameren Services, on behalf of ATXI, has strong project management emphasis and
10 experience. Ameren Services has documented corporate project oversight policies and procedures
11 that govern all phases of transmission line projects, including this Project. These policies and
12 procedures are consistent with the Project Management Institute's Project Management Book of
13 Knowledge ("PMBOK"), which is an ANSI standard. Ameren Services' policies describe key
14 steps in ensuring adequate and efficient construction, such as engineering design calculation
15 checking, constructability reviews, project risk registers with defined risk mitigation plans, and
16 fully integrated logic-driven schedules. Further, monthly status reports with key project health
17 metrics are reviewed with management. The monthly status reports identify issues affecting
18 project execution, potential high impact risks, and cost and schedule performance.

19 **Q. Please explain how ATXI will supervise construction of the Project.**

20 A. Ameren Services' Transmission Construction Services group will have primary
21 responsibility for job site supervision during construction of the Project. In addition to this
22 supervision, employees engaged in design engineering, project controls, and safety will also

1 oversee construction. Finally, construction contractors will be continuously managed through field
2 inspections, testing (as required), and construction review.

3 **Q. Will ATXI ensure that the Project is designed and constructed in accordance**
4 **with all applicable laws and regulations?**

5 A. Yes. The Ameren Services personnel involved in the design and construction of
6 the Project are regularly involved in the design and construction of transmission lines in Missouri.
7 As such, they are aware of the laws and regulations applicable to such design and construction.
8 When changes are made to these laws and regulations, Ameren Services employees involved in
9 regulatory issues advise those affected by the changes to implement any modifications in process
10 or procedure necessary to stay compliant. Through its experience and the process to address
11 changes, Ameren Services and ATXI will ensure that they comply with all applicable federal and
12 state regulations and orders of the Commission, including the National Electrical Safety Code
13 (“NESC”).

14 **Q. What is ATXI’s capability to efficiently manage and supervise construction of**
15 **the Project?**

16 A. ATXI utilizes the services provided by Ameren Services, and thus is capable of
17 efficiently managing and supervising construction of the Project. Ameren Services and its
18 personnel, on behalf of its transmission-owning affiliates, has successfully built many transmission
19 line projects. Further, the Project will be designed and constructed in accordance with all
20 applicable federal, state and local regulations and the NESC. As explained, Ameren Services, on
21 behalf of ATXI, will manage and supervise construction of the Project.

22 **IV. OVERVIEW OF PROJECT SCHEDULE**

23 **Q. What is the planned in-service date for the Project?**

1 A. The planned in-service date for the Project is December 1, 2023. The in-service
2 date has been approved by MISO.

3 **Q. By when does ATXI request that the Commission approve its application for**
4 **a CCN?**

5 A. December 30, 2021.

6 **Q. Why is that date significant?**

7 A. In order to meet the in-service date, it is critical that the CCN is granted by
8 December 30, 2021, so right-of-way acquisition efforts can begin in earnest the following month.
9 The schedule calls for construction to commence in the summer of 2023 in order for the in-service
10 date to be met. Based on our experience with major transmission projects like this one, if we do
11 not proceed with right-of-way acquisition in earnest by January, we will not have sufficient right-
12 of-way acquired in order to commence construction in an orderly fashion next summer. Thus, our
13 construction schedule may not be met, jeopardizing ATXI's meeting the required in-service date.

14 **Q. Please provide an overview of the anticipated schedule for the Project.**

15 A. Attached to this testimony is Schedule JJ-01, that contains a high-level summary of
16 the schedule we plan to follow for the development of the Project. For purposes of this testimony,
17 I would generally summarize the Project as having six phases: (1) public engagement and routing,
18 (2) regulatory approvals, (3) real estate acquisition (4) pre-construction activity, (5) construction
19 and (6) restoration. The following table shows a general timeline for these phases:

Activity	Start	Finish
Public Engagement and Routing	Summer 2020	March-2021
Regulatory Approvals	April-2021	Dec-2021
Right-of-Way Acquisition	Jan-2022	Dec-2022

Pre-Construction Activity	June-2022	Aug-2023
Construction	June-2023	Dec-2023
Restoration	Dec-2023	June-2024

Q. Please describe what the public engagement and routing process entails.

A. Public outreach began in the summer of 2020 and continued throughout the route selection process. Due to the COVID-19 pandemic, the outreach process was augmented to allow more people to engage in the outreach process safely. We have also been coordinating with environmental agencies, county commissioners, contractors, and other stakeholders. This is covered in more detail in the direct testimony of Emily Hyland.

Q. Please describe the regulatory approvals required for this Project.

A. Outside of the CCN, this Project may require federal, state and local permitting which generally include items like environmental permits and road-related approvals. Environmental surveys and studies will also be necessary to comply with various environmental laws (Endangered Species Act, Clean Water Act, etc.). Some of those permits may be obtained during the pendency of the CCN case. Others may come later in project development. ATXI is committed to working with all regulatory authorities to ensure we have all of the necessary permits and approvals to develop the Project.

Q. Please describe the real estate acquisition process.

A. We plan to request a 125-foot-wide permanent easement from landowners that have been identified as owning property along the Proposed Route, as that term is used in the testimony of Dan Schmidt. We may also require temporary construction easements to allow equipment setup

1 outside the 125-foot wide right-of-way ("ROW")¹ or access routes that are necessary to construct
2 the project. ATXI will negotiate in good faith with all landowners. ATXI's real estate acquisition
3 process is covered in more detail in the direct testimony of Craig Hiser.

4 **Q. Please describe the pre-construction activity.**

5 A. As we obtain easement agreements, we will begin environmental studies and
6 surveys, conduct geotechnical explorations, assess and install construction access, and begin
7 vegetation clearing. Engineering will continue finalizing detailed designs of the Transmission
8 Line and Whipple Substation and begin material procurement for both.

9 **Q. Please describe the Construction process.**

10 A. During this process, we plan to pour foundations for the Transmission Line in May
11 2023, and begin actual line construction in July 2023. Transmission line construction consists of
12 steel structure installation and conductor and Optical Ground Wire ("OPGW") stringing. We plan
13 to begin construction of the Whipple Substation in August 2023. Substation construction consists
14 of site work, foundations, structures and electrical equipment installation. We expect to finish
15 construction of both the Transmission Line and Whipple Substation in November 2023 with testing
16 and inspections completing by December 2023. We expect the Project to be fully operational in
17 December 2023.

18 **V. COST DETAILS OF THE PROJECT**

19 **Q. What is the anticipated cost of the Project?**

20 A. The total cost of ATXI-Wabash Development is approximately \$68 million.
21 ATXI's portion (*i.e.*, the Project) is estimated to cost approximately \$40 million and Wabash
22 Valley's investment in the ATXI-Wabash Development is estimated to cost approximately \$28

¹ In instances where, for example, our contractors may need to pull wire through a hard angle turn in the line/route.

1 million. These figures do not take into consideration the sale of the Ameren Missouri assets to
2 Wabash Valley. The estimated value of those assets is expected to be under \$1 million.

3 **Q. How was the Project cost determined?**

4 A. Once the Transmission Line route was selected,² engineering provided preliminary
5 design information and a detailed cost estimate was developed for the 138-kV transmission line
6 along the selected route. The cost estimate parameters were quantified in part using Mr. Schmidt's
7 route analysis information supplemented with preliminary pole location information from
8 engineering to estimate the total number of structures. Material, foundation, and construction cost
9 estimates were based on the total number and general type of each structure in conjunction with
10 historical values for material and labor and the route length using data from projects of comparable
11 size and construction. The easement costs were estimated using average costs per acre of land
12 within the study area. Using this methodology, an estimated cost of approximately \$34 million
13 was derived. In addition, the engineering groups developed an estimate for the Whipple
14 Substation.

15 **Q. What is the estimated cost for the Whipple Substation?**

16 A. The estimate for the Whipple Substation is \$6 million.

17 **Q. Are there any other costs associated with the Project that you have not**
18 **discussed?**

19 A. Yes. In order to interconnect the Project with Ameren Missouri's existing
20 transmission system, modifications must be made to Ameren Missouri's Wedekind-Charmin 161-
21 kV transmission line termination point. Ameren Missouri will terminate this line into the New

² Covered in more detail by the direct testimony of Emily Hyland and Dan Schmidt.

TOT Substation constructed by Wabash Valley. ATXI intends to reimburse Ameren Missouri for those costs, which are estimated to be approximately \$530,000.

Q. What is the total estimated cost for the Project?

A. Adding each of the foregoing components together, including the cost of the Ameren Missouri line work, produces a total estimated cost of \$40.6 million. Please see Schedule JJ-02 for a summary of the various Project costs.

VI. OPERATION AND RESTORATION

Q. Please provide an overview of ATXI's plans for operating the Project.

A. Ameren subsidiaries currently own and operate over 8,300 miles of transmission lines across multiple states. ATXI will obtain operations and maintenance services from Ameren Services once the Project is complete. Ameren Services is providing these same services to ATXI for other transmission lines owned by ATXI. Ameren Services maintains a primary control center that will conduct all operational switching and coordination with adjacent and interconnected systems. Once the Project is placed into service, it will be continuously monitored through SCADA by the control center. The control center is staffed around the clock by system operators that are certified by NERC. The system operators are required to maintain their certification through a combination of computer based training and live system simulation drills. Ameren Services also maintains backup control centers in the unlikely event that the primary control center must be evacuated to minimize any potential disruption to operating the transmission system.

Q. Please provide an overview of ATXI's plans for maintaining the Project.

After the Transmission Line is placed into service, various Ameren Services transmission maintenance and management groups (line, substation, vegetation) will follow a routine cycle of patrols and coordinate scheduled maintenance. These patrols will be a combination of aerial

1 patrols and foot patrols as defined by internal maintenance standards. Any maintenance issues
2 identified during the patrols will be given a priority as provided by internal maintenance standards
3 and a remediation action will be scheduled based on that priority. Ameren Services will then
4 identify the labor resources necessary to address the remediation. In general, Ameren Services has
5 a complete and robust line maintenance program that is defined by and subject to numerous
6 internal standards, including those governing the routine patrol of assets and providing
7 expectations around the repair of any issues that are identified.

8 With respect to substation maintenance, Ameren subsidiaries currently own and operate
9 over 300 substations that contain transmission class equipment. Ameren Services and other
10 Ameren operating subsidiaries maintain in-house substation maintenance expertise as well as
11 operations and maintenance personnel at locations spread throughout Missouri and Illinois. All
12 transmission substations are inspected routinely and the individual equipment contained therein
13 (breakers, etc.) is subject to an internal substation maintenance strategy setting equipment-specific
14 maintenance expectations. Substation equipment is maintained to meet or exceed requirements
15 set by NERC, and Ameren Services maintains documentation verifying this compliance, as well
16 as information documenting the intervals at which maintenance activities are performed and the
17 scope of work executed on any maintenance projects or visits.

18 **Q. Please provide an overview of ATXI's plans for restoration of safe and**
19 **adequate service after significant, unplanned/forced outages of the Project.**

20 A. Ameren Services has documented processes governing responses to unplanned
21 outages. Ameren Services will apply these procedures to the Transmission Line by clearly
22 defining roles and responsibilities across its experienced group of subject matter experts.

1 Ameren Services operators will monitor the Transmission Line 24/7. If an unplanned
2 outage occurs, subject matter experts will be assigned to review the outage data, utilize fault
3 location information to determine distance to fault, dispatch field resources for make safe activities
4 and to assess damage, and determine material and labor resources necessary for the safest and most
5 efficient restoration. Ameren Services maintains a close relationship with multiple contract
6 partners and tracks their staffing levels on Ameren projects on a continual basis. This information
7 is used to determine the best resources to respond to the situation. Ameren Services also has access
8 to an experienced staff of internal lineman that can respond to storm damage if necessary.

9 Ameren Services and other Ameren operating subsidiaries maintain an extensive stock of
10 spare parts for both planned and unplanned transmission needs. In the unlikely event that a single
11 or multiple steel poles would fail, the immediate restoration of the line would be addressed using
12 wooden structure material to quickly return the line to service. A planned project would then be
13 executed to replace the equivalent steel structures as needed.

14 VII. CONCLUSION

15 **Q. Does this conclude your direct testimony?**

16 **A. Yes, it does.**

Schedule JJ-01

Limestone Ridge Project

Activity ID	Activity Name	Original Duration	Start	Finish	2021												2022												2023												2024												2025	
					Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb															
Project: LRP Limestone Ridge Project		668d	01-Apr-21 A	27-Jun-24	27-Jun-24, Project: LRP Limestone Ridge Project																																																	
A1000	PSC Application	180d	01-Apr-21 A	30-Dec-21	PSC Application																																																	
A1010	Engineering	480d	01-Apr-21 A	29-Jun-23	Engineering																																																	
A1020	Environmental Permitting & Monitoring	660d	03-May-21*	27-Jun-24	Environmental Permitting & Monitoring																																																	
A1030	Right-of-Way Acquisition	208d	03-Jan-22*	29-Dec-22	Right-of-Way Acquisition																																																	
A1040	Line Access Construction	226d	01-Jun-22*	29-Jun-23	Line Access Construction																																																	
A1050	Right-of-Way Clearing	87d	01-Nov-22*	30-Mar-23	Right-of-Way Clearing																																																	
A1060	Substation Material Procurement	225d	01-Sep-22*	28-Sep-23	Substation Material Procurement																																																	
A1070	Line Material Procurement	225d	01-Sep-22*	28-Sep-23	Line Material Procurement																																																	
A1080	Transmission Line Foundation Installation	53d	01-May-23*	31-Jul-23	Transmission Line Foundation Installation																																																	
A1090	Transmission Line Construction	88d	03-Jul-23*	30-Nov-23	Transmission Line Construction																																																	
A1100	Substation Construction	71d	01-Aug-23*	30-Nov-23	Substation Construction																																																	
A1110	Final Inspections	52d	02-Oct-23*	28-Dec-23	Final Inspections																																																	

Schedule JJ-02 Public

Redacted portions contain trade secrets and market-specific information relating to services offered in competition with others

20 CSR 4240-2.135(2)(A)(3) & (8)

Estimated Project Costs

Work Order	Description	Component Total
JOQD1	Substation	\$ 6,196,684
JOQD2	ATXI Line	\$ 33,831,554
JOQD3	AMMO Line	\$ 527,273
	Total	\$ 40,555,510

	Base Estimate	Contingency	Total
JOQD1 - Substation			
Construction			
Material (poles, wires, other)			
Engineering			
AFUDC			
Indirect Overheads			
Total			\$6,196,684
JOQD2 - ATXI Line			
Construction			
Material (poles, wires, other)			
Real estate and permitting			
Engineering			
AFUDC			
Indirect Overheads			
Total			\$33,831,554
JOQD3 - AMMO Line			
Construction			
Material (poles, wires, other)			
Engineering			
AFUDC			
Indirect Overheads			
Total			\$527,273

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Ameren)
Transmission Company of Illinois for a)
Certificate of Public Convenience and)
Necessity to Construct, Install, Own, Operate,)
Maintain, and Otherwise Control and Manage) Case No. EA-2021-0087
a 138 kV Transmission Line and associated)
facilities in Perry and Cape Girardeau)
Counties, Missouri)

AFFIDAVIT

1. My name is James Jontry. I am Senior Project Manager for Ameren Services, which is a subsidiary of Ameren Corporation and an affiliate of Ameren Transmission Company of Illinois, the Applicant in the above-captioned proceeding.
2. I have read the above and foregoing Direct Testimony and the statements contained therein are true and correct to the best of my information, knowledge and belief.
3. I am authorized to make this statement on behalf of Ameren Transmission Company of Illinois.
4. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ James Jontry
James Jontry
Senior Project Manager
Ameren Services

Date: 4/27/2021